

The following schedule of depositions has been agreed to by counsel in the MDL proceeding and the Texas State Court consolidated cases. Pursuant to the Magistrate's Entry for June 13, 2001, the schedule can be modified only by agreement of all parties or by order of the Court. The following counsel can be contacted for further information about the schedule:

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MDL DEPOSITION SCHEDULE (Revised – 3/07/02)

<u>Date</u>	<u>Deponent</u>	<u>Time</u>	<u>Location</u>
Week of July 30, 2001			
Monday, 7/30	Allan Rauner	9:00 A.M.	Dearborn, MI--Hyatt Regency
Tuesday, 7/31	Stephanie Sweeney	9:00 A.M.	Dearborn, MI--Hyatt Regency
	Bruce Halverson	1:00 P.M.	Nashville, TN--Hilton Suites
Wednesday, 8/1	Stephanie Sweeney	9:00 A.M.	Dearborn, MI--Hyatt Regency
Thursday, 8/2	Tom Baughman	9:00 A.M.	Dearborn, MI--Hyatt Regency
Friday, 8/3	Tom Baughman	9:00 A.M.	Dearborn, MI--Hyatt Regency

<u>Date</u>	<u>Deponent</u>	<u>Time</u>	<u>Location</u>
Week of August 6, 2001			
Tuesday, 8/7	Brian Quieser	9:00 A.M.	Akron, OH--Sheraton Suites
Wednesday, 8/8	Michael Reep	9:00 A.M.	Akron, OH--Sheraton Suites
Thursday, 8/9	Robert Martin	9:00 A.M.	Nashville, TN--Hilton Suites

Week of August 13, 2001			
Monday, 8/13	Ernie Grush	9:00 A.M.	Dearborn, MI--Hyatt Regency
Tuesday, 8/14	Ernie Grush	9:00 A.M.	Dearborn, MI--Hyatt Regency
	Dan Saurer	9:00 A.M.	Akron, OH--Sheraton Suites
Wednesday, 8/15	Ernie Grush	9:00 A.M.	Dearborn, MI--Hyatt Regency
	Dan Saurer	9:00 A.M.	Akron, OH--Sheraton Suites
Thursday, 8/16	Charles White	9:00 A.M.	Dearborn, MI--Hyatt Regency
Friday, 8/17	Charles White	9:00 A.M.	Dearborn, MI--Hyatt Regency

Week of August 20, 2001			
Monday, 8/20	John Behr	9:00 A.M.	Dearborn, MI--Hyatt Regency
	Richard Reichenbach	9:00 A.M.	Dearborn, MI--Hyatt Regency
Tuesday, 8/21	John Behr	9:00 A.M.	Dearborn, MI--Hyatt Regency
	Richard Reichenbach	9:00 A.M.	Dearborn, MI--Hyatt Regency
Wednesday, 8/22	Jacques Nasser	8:00 A.M.	Dearborn, MI-- Hyatt Regency
Thursday, 8/23	Jacques Nasser	8:00 A.M.	Dearborn, MI-- Hyatt Regency

Week of August 27, 2001			
Monday, 8/27	Dale Claudepierre	9:00 A.M.	Dearborn, MI--Hyatt Regency
Tuesday, 8/28	Dale Claudepierre	9:00 A.M.	Dearborn, MI--Hyatt Regency
Wednesday, 8/29	Dale Claudepierre	9:00 A.M.	Dearborn, MI--Hyatt Regency

<u>Date</u>	<u>Deponent</u>	<u>Time</u>	<u>Location</u>
Week of September 3, 2001			
Tuesday, 9/4	Marty Yurjevich	9:00 A.M.	Akron, OH--Sheraton Suites
Wednesday, 9/5	Marty Yurjevich	9:00 A.M.	Akron, OH--Sheraton Suites
Thursday, 9/6	George Bohm	9:00 A.M.	Akron, OH--Sheraton Suites
Friday, 9/7	George Bohm	9:00 A.M.	Akron, OH--Sheraton Suites

Week of September 24, 2001			
Monday, 9/24	Dave Trost	9:00 A.M.	Dearborn, MI--Hyatt Regency
Tuesday, 9/25	Dave Trost	9:00 A.M.	Dearborn, MI--Hyatt Regency
Wednesday, 9/26	Melanie Gumz	9:00 A.M.	Dearborn, MI--Hyatt Regency
Thursday, 9/27	Melanie Gumz	9:00 A.M.	Dearborn, MI--Hyatt Regency
Friday, 9/28	Melanie Gumz	9:00 A.M.	Dearborn, MI--Hyatt Regency

Week of October 1, 2001			
Wednesday, 10/3	James Wyzgoski	9:00AM.	Akron, OH--Sheraton Suites
Thursday, 10/4	James Wyzgoski	9:00AM.	Akron, OH--Sheraton Suites
Friday, 10/5	Marv Janssen	9:00 A.M.	Akron, OH--Sheraton Suites

Week of October 8, 2001			
Monday, 10/8	James Johnson	9:00 A.M.	Dearborn, MI--Hyatt Regency
Tuesday, 10/9	James Johnson	9:00 A.M.	Dearborn, MI--Hyatt Regency
Wednesday, 10/10	James Johnson	9:00 A.M.	Dearborn, MI--Hyatt Regency

<u>Date</u>	<u>Deponent</u>	<u>Time</u>	<u>Location</u>
Week of October 15, 2001			
Monday, 10/15	Rick Duvall	9:00 A.M.	Akron, OH—Sheraton Suites
Tuesday, 10/16	Hideo Hara	9:00 A.M.	Akron, OH—Sheraton Suites
	Tim Davis	9:00 A.M.	Dearborn, MI--Hyatt Regency
Wednesday, 10/17	Hideo Hara	9:00 A.M.	Akron, OH—Sheraton Suites
	Tim Davis	9:00 A.M.	Dearborn, MI--Hyatt Regency
Thursday, 10/18	Shu Ishibashi	9:00 A.M.	Nashville, TN--Hilton Suites
	Bill Lyle	9:00 A.M.	Akron, OH—Sheraton Suites
Friday, 10/19	Shu Ishibashi	9:00 A.M.	Nashville, TN--Hilton Suites
	Bill Lyle	9:00 A.M.	Akron, OH—Sheraton Suites

Week of October 22, 2001			
Monday, 10/22	Doug Scott	9:00 A.M.	Dearborn, MI--Hyatt Regency
Tuesday, 10/23	Doug Scott	9:00 A.M.	Dearborn, MI--Hyatt Regency
Wednesday, 10/24	Joe Bradley	9:00 A.M.	Dearborn, MI--Hyatt Regency
Thursday, 10/25	Joe Bradley	9:00 A.M.	Dearborn, MI--Hyatt Regency
Friday, 10/26	Joe Bradley	9:00 A.M.	Dearborn, MI--Hyatt Regency

Week of October 29, 2001			
Monday, 10/29	Bruce Halverson	9:00 A.M.	Nashville, TN--Hilton
Tuesday, 10/30	Bruce Halverson	9:00 A.M.	Nashville, TN--Hilton

Week of November 2, 2001			
Friday, 11/2	Frank Figliomeni	9:00 A.M.	Akron, OH—Sheraton Suites

<u>Date</u>	<u>Deponent</u>	<u>Time</u>	<u>Location</u>
Week of November 5, 2001			
Monday, 11/5	Deepak Parekh	9:00 A.M.	Dearborn, MI--Hyatt Regency
Tuesday, 11/6	Deepak Parekh	9:00 A.M.	Dearborn, MI--Hyatt Regency
Wednesday, 11/7	Deepak Parekh	9:00 A.M.	Dearborn, MI--Hyatt Regency

Week of November 12, 2001			
Wednesday, 11/14	Jorge Gonzalez	9:00 A.M.	Miami, FL

Week of November 19, 2001			
Monday, 11/19	Glenn Drake	9:00 A.M.	Dearborn, MI--Hyatt Regency
Tuesday, 11/20	Glenn Drake	9:00 A.M.	Dearborn, MI--Hyatt Regency
Wednesday, 11/21	Glenn Drake	9:00 A.M.	Dearborn, MI--Hyatt Regency

Week of November 26, 2001			
Tuesday, 11/27	Robert Martin	9:00 A.M.	Nashville, TN--Hilton

Week of December 31, 2001			
Thursday, 1/3	Steve Schoenfeld	9:00 A.M.	Akron, OH--Sheraton Suites
Friday, 1/4	Steve Schoenfeld	9:00 A.M.	Akron, OH--Sheraton Suites

<u>Date</u>	<u>Deponent</u>	<u>Time</u>	<u>Location</u>
Week of January 7, 2002			
Tuesday, 1/8	Barry Humbert	9:00 A.M.	Akron, OH--Sheraton Suites
Wednesday, 1/9	Barry Humbert	9:00 A.M.	Akron, OH--Sheraton Suites
Thursday, 1/10	Harold McGill	9:00 A.M.	Akron, OH--Sheraton Suites
Thursday, 1/10	Bill Smith	9:00 A.M.	Dearborn, MI--Hyatt Regency
Friday, 1/11	Harold McGill	9:00 A.M.	Akron, OH--Sheraton Suites
Friday, 1/11	Bill Smith	9:00 A.M.	Dearborn, MI--Hyatt Regency

Week of January 14, 2002			
Monday, 1/14	Judy Sullivan	9:00 A.M.	Dearborn, MI--Ritz Carlton
Tuesday, 1/15	Judy Sullivan	9:00 A.M.	Dearborn, MI--Ritz Carlton
	Ken Zino	9:00 A.M.	Dearborn, MI--Ritz Carlton
	Paul Sekula	9:00 A.M.	Akron, OH--Sheraton Suites
Wednesday, 1/16	Judy Sullivan	9:00 A.M.	Dearborn, MI--Ritz Carlton
	Dave Stalnaker	9:00 A.M.	Akron, OH--Sheraton Suites

Week of January 21, 2002			
Wednesday, 1/23	Joe Pierucci	9:00 A.M.	Dearborn, MI -- Ritz Carlton
Thursday, 1/24	Greg Oswalt	9:00 A.M.	Dearborn, MI -- Ritz Carlton
	Hoetzel	9:00 A.M.	Akron, OH--Sheraton Suites
Friday, 1/25	Jan Bleyaert	9:00 A.M.	Dearborn, MI -- Ritz Carlton
	Greg Rasor	9:00 A.M.	Akron, OH--Sheraton Suites

<u>Date</u>	<u>Deponent</u>	<u>Time</u>	<u>Location</u>
Week of January 28, 2002			
Monday, 1/28	30b6 – FMC – Used Vehicle Auction/Pricing	9:00 A.M.	Dearborn, MI--Hyatt Regency
Tuesday, 1/29	Charles Seilnacht	9:00 A.M.	Dearborn, MI--Hyatt Regency
	30b6 – FMC – Incentive Pgms	8:30 A.M.	Dearborn, MI--Hyatt Regency
	30b6 – FMC – New Vehicle Pricings	9:00 A.M.	Dearborn, MI--Hyatt Regency
Wednesday, 1/30	Naomi Hughey	9:00 A.M.	Dearborn, MI--Hyatt Regency
	Charles Seilnacht	9:00 A.M.	Dearborn, MI--Hyatt Regency
	Isao Togashi	9:00 A.M.	Dearborn, MI--Hyatt Regency
Thursday, 1/31	Isao Togashi	9:00 A.M.	Dearborn, MI--Hyatt Regency
	Naomi Hughey	9:00 A.M.	Dearborn, MI--Hyatt Regency
	30b6 – Hertz - Acquisition and Disposition of Explorers	9:00 A.M.	Dearborn, MI--Hyatt Regency

Week of February 4, 2002			
Tuesday, 2/5	Akira Nozawa	9:00 A.M.	Nashville, TN--Lopus Vanderbilt
Wednesday, 2/6	Akira Nozawa	9:00 A.M.	Nashville, TN--Lopus Vanderbilt
Thursday, 2/7	Yuji Tomiyasu	9:00 A.M.	Cleveland, OH--Squire Sanders
Friday, 2/8	Yuji Tomiyasu	9:00 A.M.	Cleveland, OH--Squire Sanders

Week of February 11, 2002			
Tuesday, 2/12	Shingo Katsura	9:00 A.M.	Cleveland, OH--Squire Sanders
Wednesday, 2/13	Shingo Katsura	9:00 A.M.	Cleveland, OH--Squire Sanders
Thursday, 2/14	Masayuki Ohashi	9:00 A.M.	Cleveland, OH--Squire Sanders
Friday, 2/15	Masayuki Ohashi	9:00 A.M.	Cleveland, OH--Squire Sanders

<u>Date</u>	<u>Deponent</u>	<u>Time</u>	<u>Location</u>
Week of February 18, 2002			
Tuesday, 2/19	Kenichi Tanaka	9:00 A.M.	Cleveland, OH--Squire Sanders
Wednesday, 2/20	Kenichi Tanaka	9:00 A.M.	Cleveland, OH--Squire Sanders
Thursday, 2/21	Ryotaro Fukushima	9:00 A.M.	Cleveland, OH--Squire Sanders
Friday, 2/22	Ryotaro Fukushima	9:00 A.M.	Cleveland, OH--Squire Sanders

Week of March 4, 2002			
Tuesday, 3/5	Shigeo Watanabe	9:00 A.M.	Osaka, Japan--U.S. Consulate
Wednesday, 3/6	Shigeo Watanabe	9:00 A.M.	Osaka, Japan--U.S. Consulate
Thursday, 3/7	Yoichiro Kaizaki	9:00 A.M.	Osaka, Japan--U.S. Consulate
Friday, 3/8	Yoichiro Kaizaki	9:00 A.M.	Osaka, Japan--U.S. Consulate

Week of March 11, 2002			
Monday, 3/11	Yosio Yoshida	9:00 A.M.	Osaka, Japan--U.S. Consulate
Tuesday, 3/12	Yosio Yoshida	9:00 A.M.	Osaka, Japan--U.S. Consulate

Week of March 25, 2002			
Wednesday, 3/27	William Clay Ford, Jr.	9:00 A.M.	Dearborn, MI--Ritz Carlton
Thursday, 3/28	William Clay Ford, Jr.	9:00 A.M.	Dearborn, MI--Ritz Carlton

Week of April 8, 2002			
Wednesday, 4/10	Tom Baughman	9:00 A.M.	Dearborn, MI--Hyatt Regency
Thursday, 4/11	Tom Baughman	9:00 A.M.	Dearborn, MI--Hyatt Regency